FILED 20 MAR '19 12:39 USDC-ORE

### UNITED STATES DISTRICT COURT

## DISTRICT OF OREGON

#### **EUGENE DIVISION**

UNITED STATES OF AMERICA

6:19-cr- 98-MC

V

INDICTMENT

JONATHAN L. MANN,

18 U.S.C. § 2261A(2)(B)

Defendant.

#### THE GRAND JURY CHARGES:

# COUNT 1 (Cyberstalking) (18 U.S.C. § 2261A(2)(B))

From on or about September 17, 2015, through on or about February 8, 2017, in the District of Oregon, defendant **JONATHAN L. MANN**, with the intent to harass and intimidate, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to AV1.

In violation of Title 18, United States Code, Section 2261A(2)(B).

Indictment

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## COUNT 2 (Cyberstalking) (18 U.S.C. § 2261A(2)(B))

From on or about February 7, 2017, through on or about March 1, 2018, in the District of Oregon, defendant **JONATHAN L. MANN**, with the intent to harass and intimidate, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to AV2.

In violation of Title 18, United States Code, Section 2261A(2)(B).

Dated: March 20, 2019

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS United States Attorney

JEFFREY S. SWEET

Assistant United States Attorney